



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MAY 20 1999

MEMORANDUM

SUBJECT: National Remedy Review Board Recommendations for the Southwest Operable Unit for Ground Water at the Massachusetts Military Reservation Superfund Site

FROM: Bruce K. Means, Chair 
National Remedy Review Board

TO: Patricia L. Meaney, Director
Office of Site Remediation and Restoration
EPA Region 1

Purpose

The National Remedy Review Board (NRRB) has completed its review of the proposed remedial action for the southwest operable unit (OU) for ground water at the Massachusetts Military Reservation on Upper Cape Cod, Massachusetts. This memorandum documents the NRRB's advisory recommendations.

Context for NRRB Review

As you recall, the Administrator announced the NRRB as one of the October 1995 Superfund Administrative Reforms to help control response costs and promote consistent and cost-effective decisions. The NRRB furthers these goals by providing a cross-regional, management-level, "real time" review of high cost proposed response actions. The board reviews all proposed cleanup actions that exceed its established cost-based review criteria.

The NRRB review evaluates the proposed actions for consistency with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and relevant Superfund policy and guidance. It focuses on the nature and complexity of the site; health and environmental risks; the range of alternatives that address site risks; the quality and reasonableness of the cost estimates for alternatives; regional, state/tribal, and other stakeholder opinions on the proposed actions, and any other relevant factors.

Generally, the NRRB makes "advisory recommendations" to the appropriate regional decision maker before the region issues the proposed response action for public comment. The region will then include these recommendations in the Administrative Record for the site. While the region is expected to give the board's recommendations substantial weight, other important

-- pre-decisional; not for distribution --

factors, such as subsequent public comment or technical analyses of response options, may influence the final regional decision. It is important to remember that the NRRB does not change the Agency's current delegations or alter in any way the public's role in site decisions.

NRRB Advisory Recommendations

The NRRB reviewed the informational package for the proposed remedial action for the southwest operable unit for ground water at the Massachusetts Military Reservation Superfund Site, and discussed related issues with EPA project manager Bob Lim on April 26, 1999. Based on this review and discussion, the NRRB offers the following comments.

- The material presented to the board describes a three step process for determining how far this action may be driven (i.e., how much ground water restoration may be required, ultimately). Step one would restore the plumes to federal or state MCLs and other risk-based contaminant levels equivalent to a Hazard Index of 1; step two would involve a cumulative risk assessment for any residual contamination to assess whether additional restoration should be performed to achieve more protective cleanup levels within EPA's risk range; and, step three would evaluate the feasibility of yet additional restoration to achieve background levels. Since, however, the package presented to the board provided only analyses specific to the decision about restoration to MCLs, the board's discussion focused primarily on this first step in the process.
- Given that the proposed action is described as a three step process and may involve significant analyses and/or resource expenditures in the future, the board is concerned that the action is framed as a "final" record of decision (ROD). The board believes that the Air Force Center for Environmental Excellence (AFCEE) should address the decision steps in separate actions and consider the action to restore ground water to MCLs an "interim" action. This would permit (1) the continued evaluation of additional restoration needs, (2) any subsequent actions if warranted and feasible, and, (3) important opportunities for stakeholder involvement in these later restoration decisions.
- The AFCEE did not evaluate air stripping as a ground water treatment alternative for the plumes addressed by this OU. The board notes that at other sites air stripping has been a cost effective method to treat contaminated ground water, and further, that it is identified as a "presumptive technology for treatment of extracted ground water" in OSWER Directive 9283.1-12 (Presumptive Response Strategy and Ex-Situ Treatment Technologies for Contaminated Ground Water at CERCLA Sites). The board asks the region to explain why it did not recommend that AFCEE retain air stripping among the treatment alternatives it evaluated in detail for this action.
- Materials presented to the board did not specify how the preferred alternative for the FS 13 plume achieves remedial action objectives (which include plume restoration) within a reasonable time frame. Given that the Massachusetts Comprehensive State Groundwater Protection Plan classifies this aquifer as a sole source aquifer of the highest priority, the region should clarify how and when AFCEE expects to achieve these objectives throughout the plume. Should the region determine that active restoration of the plume or any part of it is not among the remedial action objectives (RAOs) for this action, it should provide the supporting analysis and decision rationale in the site decision documents (e.g., triggers and details for invoking a future restoration contingency action; bases for a technical impracticability waiver, etc.).

- The preferred alternative does not specify the institutional controls that will be used to restrict certain ground water uses. OSWER Guidance No. 9355.7-04 "Land Use in the CERCLA Remedy Selection Process" (May 25, 1995) directs site managers to " . . . determine the type of institutional control to be used, the existence of the authority to implement the institutional control, and the appropriate entity's resolve and ability to implement . . . the control." The Board recommends that the AFCEE perform such an analysis and include it in the decision documents for this action.
- Given that the treated water will be reinjected, the board recommends that the AFCEE evaluate whether the state underground injection code is an applicable or relevant and appropriate requirement (ARAR) for this action.

The NRRB appreciates the region's efforts to work closely with the state, the AFCEE, and community groups at this site. The board members also express their appreciation to the region for its participation in the review process. We encourage Region 1 management and staff to work with their regional NRRB representative and the Region 1/9 Accelerated Response Center in the Office of Emergency and Remedial Response to discuss any appropriate follow-up actions.

Please do not hesitate to give me a call if you have any questions at 703-603-8815.

cc: S. Luftig
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